

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

---

R.J. ZAYED, In His Capacity  
As Court-Appointed Receiver  
For Oxford Global Partners, LLC,  
Universal Brokerage FX, and Other  
Receiver Entities,

Plaintiff

Case No: 013-cv-1896 SRN/ SER

v.

David and Dao Allen, Judith Averett, Patricia and  
Jasper Calandra, Rose Furner, Mark Hanby, Adel  
("A.K.") Hilal, Geraldine Jackman, Norma Johnson,  
Willis Wayne King, Don and Pamela Labbee,  
Andrew Lyon, Jeffrey Lyon, Jeffrey Maki, Steven  
Perkins, Richard Plantan, Douglas Reed, David  
Sherman, John Sterback, Mark Stoltenberg, Jane  
Wamsley as trustee for the Glen Van Lehn Living  
Trust, Michael ("Bruce") Wu, Robert and Dianne  
Birk, Margaret Anderson, Mary Francoeur, George  
and Shirley Janssen, Joseph Koehnen, and Katherine  
Sobieck,

Defendants.

---

**PLAINTIFF'S MOTION TO CLERK FOR DEFAULT JUDGMENT AGAINST  
DEFENDANT ROSE FURNER**

Plaintiff R.J Zayed as Receiver for Trevor Cook et al. ("Receiver") hereby  
requests the Clerk of Court, pursuant to Rule 55(b)(1) of the Federal Rules of Civil  
Procedure, for entry of a judgment by default against Defendant Rose Furner  
("Defendant").

Plaintiff filed his complaint on July 15, 2013. (Declaration of Joseph M. Kaczrowski in Support of Receiver's Motion ("Kaczrowski Decl.") ¶ 2.) Defendant was served on September 11, 2013. (Kaczrowski Decl. ¶ 3.) Defendant failed to answer or otherwise respond in the time allowed under Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure, or seek an extension of time to answer or respond. (Kaczrowski Decl. ¶ 4.) On October 16, 2013, the Court recorded an entry of default against Defendant. (*Id.*)

Plaintiff's claim against Defendant Furner is \$8,986.00. Defendant received \$35,411.00 from Receivership entities. (Kaczrowski Decl. ¶ 5.) Defendant transferred \$26,425.00 to Receivership entities. (Kaczrowski Decl. ¶ 6.) Therefore the Receiver's Complaint sought damages of \$8,986.00 from Defendant. *Complaint*, 13-cv-1896 Docket 1 ¶ 79 (Jul. 15, 2013).

The Receiver therefore requests the Clerk of Court, pursuant to Rule 55(b)(1) of the Federal Rules of Civil Procedure, enter a judgment by default of \$8,986.00 against Defendant Furner. This motion is supported by the files, records, and proceedings herein, as well as the Declaration of Joseph M. Kaczrowski submitted herewith.

Dated: October 18, 2013

Respectfully submitted,

s/ Joseph M. Kaczrowski

Tara C. Norgard (MN Bar No. 307,683)  
Joseph M. Kaczrowski (MN Bar No. 387,843)  
Carlson, Caspers, Vandenburg,  
Lindquist & Schuman, P.A.  
225 S. 6<sup>th</sup> Street, Suite 4200  
Minneapolis, MN 55402  
Telephone: (612) 436-9600  
Facsimile: (612) 436-9605  
[tnorgard@carlsoncaspers.com](mailto:tnorgard@carlsoncaspers.com)  
[jkaczrowski@carlsoncaspers.com](mailto:jkaczrowski@carlsoncaspers.com)

*Attorneys for Plaintiff R.J. Zayed, in his capacity as court-appointed Receiver for Oxford Global Partners, Universal Brokerage FX, and other Receivership Entities*